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T.R.A. DOCKET ROOM

February 3, 2004

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
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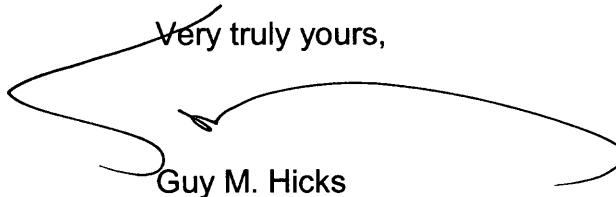
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Chairman Tate:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing fifteen copies of a Notification Report for the March 2004 data month and a Preliminary Notification Report for the data month of April 2004. These Reports are being filed with all of the state public service commissions in BellSouth's nine-state region.

Copies of the enclosed are being provided to counsel of record. Thank you for your assistance in this regard.

Very truly yours,



Guy M. Hicks

GMH:ch



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February 2, 2004

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the March 2004 data month and a Preliminary Notification Report for the data month of April 2004. These proposed changes will be discussed at the February 6, 2004 industry conference call.

BellSouth would like to bring an additional matter to the attention of the Commission and the parties. As the Commission is aware, BellSouth recently began reporting performance data using a streamlined reporting format, called Single Reporting Structure or "SRS." In connection with the transition to SRS, which was identified on the Proposed November Data Notification List filed on October 1, 2003, BellSouth discovered and corrected several errors in the preparation of the reports, which are described briefly below:

- An error was discovered on the Percent Reject Reports. With the implementation of SRS the number of Fatal Rejects was shown on non-regional reports. This was corrected with December 2003 data.
- An error was discovered in the calculation of OCI and FOCI Reports for EELS in the State of Georgia. BellSouth corrected the code to include those EEL orders completed on day 5 and day 8 as meeting the standard. This correction was made with December 2003 data.

Mr. Reece McAlister
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- Some line count entries for CLEC-specific reports reflect a null value when no troubles are reported, which causes some line counts on the CLEC-specific regional report to be incorrect. BellSouth will correct this problem with December 2003 data.
- The CLEC Specific Regional Report for Held Order Interval displays count of orders in the numerator rather than the total interval, although the calculation is performed correctly and the correct result is reported. BellSouth will correct the display of the interval with December 2003 data.
- The Regional Aggregate Report for Held Order Interval does not display the average interval for all products. BellSouth will correct this problem with December 2003 data so that averages are displayed for all products on this report.
- BellSouth is currently displaying duplicate rows of data on MSA level reports for the CLEC Specific ACNI Report in Louisiana. Bell corrected this problem to display the data a single time with December data.

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,


Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

524956/524183/524185

PROPOSED MARCH 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the March 2004 data month. Results for the March 2004 data month will be posted as follows:

Preliminary results April 20, 2004
Final results April 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-8 & O-9

Description of Change: Currently, in some cases, Non-Mechanized LSRs with multiple Clarifications or FOCs are counted twice. This occurs when a FOC/Reject is re-faxed to the CLEC from a service representative in the eastern-time zone. In this scenario, the re-faxed FOC /Reject appears as a new FOC/Reject. The response interval for this "new" FOC /Reject is measured from the receipt time of the original LSR minus one hour until the time that the re-faxed FOC/Reject is sent. BellSouth proposes to correct this problem. This proposed change was Item (1) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4785)

Impact of Change: For October 2003, the performance of Non-Mechanized Reject Interval will increase by 0.17%.

(2) *Affected Measures:* OSS-1 (North Carolina only)

Description of Change: Currently, the PMAP historical reports calculate OSS-1 for North Carolina in accordance with the Georgia SQM instead of the North Carolina SQM. The current one-month reports are correct. BellSouth proposes to

calculate historical North Carolina data in accordance with the North Carolina SQM. This proposed change was Item (2) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4788)

Impact of Change: Historical reports will be generated in accordance with the North Carolina SQM.

Provisioning Measurements

- (3) *Affected Measures:* P-3, P-4 & P-9

Description of Change: BellSouth proposes adding new fields, FIRST_CPX_STS_DTTM, SO_KEY and OCI_END_DT) to the raw data and Other Supporting Data File. The addition of these fields will have no immediate impact on replicating the SQM reports but would be available for use with future enhancements. This proposed change was Item (3) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4312)

Impact of Change: None.

- (4) *Affected Measures:* P-6 (Louisiana only)

Description of Change: BellSouth currently reports Completion Attempts Without Notice in Louisiana, which is not required by the SQM. BellSouth proposes to stop producing this report. This proposed change was Item (4) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4739)

Impact of Change: None.

- (5) *Affected Measures:* P-5

Description of Change: Currently, BellSouth is reporting xDSL products in 3 separate buckets, UNE xDSL with conditioning, UNE xDSL, without conditioning and UNE xDSL (HDSL, ADSL, and UCL). Orders in the "with and without Conditioning" disaggregations are repeated in the UNE xDSL disaggregation. The only disaggregation required by the SQM is the UNE xDSL (HDSL, ADSL, and UCL). BellSouth proposes eliminating the UNE xDSL "with and without Conditioning" disaggregation to comply with the SQM. This proposed change was Item (5) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4748)

Impact of Change: None.

- (6) *Affected Measures:* P-11 (Alabama, Mississippi, North Carolina, South Carolina, Kentucky, and Louisiana)

Description of Change: Currently, the process for producing regional Service Order Accuracy reports is manual. BellSouth proposes loading the data into the PMAP warehouse and producing the measure mechanically. This proposed change was Item (6) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4752)

Impact of Change: None.

- (7) *Affected Measures:* P-3, P-4, P-4B, P-5 & P-9

Description of Change: Currently, BellSouth is displaying all disaggregations for ACNI, PMIA, OCI and PT30 as "Dispatch," "Non-Dispatch," "Non-Dispatch (Dispatch In)" and "Non-Dispatch (Switch Based)." The SQMs only require these disaggregations for a subset of the products. BellSouth proposes displaying data in a manner consistent with the SQM. This proposed change was Item (7) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4772)

Impact of Change: None.

- (8) *Affected Measures:* P-3, P-4 & P-4B (Florida and Tennessee only)

Description of Change: Currently BellSouth is reporting, xDSL products in 3 separate buckets; UNE xDSL, with conditioning, UNE xDSL, without conditioning and UNE xDSL (HDSL, ADSL, and UCL). Orders in the "with and without conditioning" disaggregations are repeated in the UNE xDSL disaggregation. The only disaggregations required by the SQM are the UNE xDSL (HDSL, ADSL, and UCL) with and without conditioning. Bellsouth proposes eliminating the UNE xDSL (HDSL, ADSL, and UCL) disaggregation to comply with the SQM. This proposed change was Item (8) on the Preliminary March Data Notification filed on January 2, 2004. (RQ4828)

Impact of Change: None

- (9) *Affected Measures:* P-4 & P-10 (Alabama, Kentucky, Louisiana, Mississippi, North Carolina and South Carolina)

Description of Change: In calculating the Order Completion Interval ("OCI") consistent with the SQM, BellSouth only includes business days in the calculation. BellSouth recently discovered that non-business days were

erroneously being included in the OCI interval calculation for EELs and UCL. BellSouth proposes to correct the OCI interval calculation for EELS and UCL consistent with other UNE products. (RQ4943)

Impact of Change: BellSouth's proposed change would reduce OCI for EELs and UCL by an average of one day.

PRELIMINARY APRIL 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the April 2004 data month. Results for the April 2004 data month will be posted as follows:

Preliminary results	May 21, 2004
Final results	May 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-1 & O-2

Description of Change: In some cases, PMAP is not correctly matching EDI acknowledgements to EDI records, resulting in the data indicating that an acknowledgement was not sent when in fact it was sent. Bellsouth proposes to use an additional field in the source data to resolve this problem. (RQ4898)

Impact of Change: In both August and September 2003, one record was missed as a result of this problem.

(2) *Affected Measures:* O-3 & O-4

Description of Change: Currently, LNP LSRs with an error code of 9843, which occurs due to invalid or missing CSR data in CRIS, are counted as BellSouth fallout on the LNP Flow-Through report. Consistent with the SQM, LSRs that fall out for manual handling due to invalid or missing CSR data in CRIS should be planned manual fallout. BellSouth proposes to correct this error. (RQ4960)

Impact of Change: For December 2003, LNP Percent Flow-Through would have increased by 1.02%, from 93.40% to 94.40%.

Provisioning Measurements

- (3) *Affected Measures:* P-4 & P-4B (Georgia only)

Description of Change: Currently, the analogs for UNE Other Design, UNE ISDN and UNE Combo Other do not appear on the monthly report; however, these same analogs are reported for other products where applicable, BellSouth proposes to start reporting the analogs on the SQM reports for these products also. (RQ4773)

Impact of Change: Retail analog data will be displayed.

- (4) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10 & P-11

Description of Change: Currently, on the CLEC-specific reports all activity on a line that has been split between a voice and data provider (Line Splitting) is recorded as belonging to the voice provider. BellSouth proposes to assign activity on the data part of the line to the data provider and only activity on the voice part of the line to the voice provider. (RQ4863)

Impact of Change: For November 2003, on a region-wide basis, 506 line splitting orders and 6 line sharing orders were assigned incorrectly.

- (5) *Affected Measures:* P-1, P-2, P-3, P-4, P-4B, P-5, P-6, P-9 & P-10

Description of Change: Currently, only service orders with Line Splitting USOCs and an action code of "T" (Inward activity) are assigned to the Line Splitting category. BellSouth proposes a coding change so that service orders with Line Splitting USOCs and an action code of "T" (To activity) also will be assigned to Line Splitting. (RQ4871)

Impact of Change: For November 2003, in Georgia, the PMI volume for UNE Line Splitting would increase from 6 to 110 with no change in equity. The volume for UNE-P would decrease from 86,135 to 86,025 with no change in equity.

Other

(6) *Affected Measures:* CM-5

Description of Change: Currently, BellSouth produces an SRS report that only shows the average result across all interfaces; however the SQM requires data to be posted by interface. BellSouth proposes to change the report to include results for each interface. (RQ4873)

Impact of Change: Interface results will be displayed.

(7) *Affected Measures:* All CLEC specific Measures

Description of Change: Currently, when the SQM requires BellSouth to produce CLEC specific data, BellSouth has been providing data by Operation Company Number (OCN). However, in many cases, a single company may have multiple OCNs so data for that CLEC can only be obtained if the CLEC adds together the data reported for each of its multiple OCNs. In response to requests from several CLECs, BellSouth proposes to produce for each sub-metric a single data set for those CLECs that have multiple OCNs. The only exception will be for reports for which the SQM expressly requires that data be reported at the OCN level; for those reports data will continue to be reported below the parent OCN level. BellSouth also will continue to make available data by OCN in the SQM raw data. (RQ4877)

Impact of Change: This change will impact display of the State and Regional CLEC specific reports. The display of CLEC Aggregate and 12 month reports will not be affected.

Special Access Measurements

(8) *Affected Measures:* SA-8

Description of Change: Currently, there are Special Access records that are being double and triple counted due to a PMAP coding discrepancy. BellSouth proposes to update the PMAP report code to join multiple tables together through the use of a unique key. This change will eliminate overstating the numerator or volumes counts. (RQ4851)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

PARTIES OF RECORD

Docket No. 7892-U

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(01/13/04)

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2004, a copy of the foregoing document was served on the following parties, via the method indicated:

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